

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	Chapter 13
Danielle Riggs	:	
Debtor	:	Bankruptcy No. 18-17963 AMC

DEBTOR'S MOTION TO ABATE PLAN PAYMENTS AND MODIFY PLAN.

Debtor hereby requests the Court to approve Debtor's Motion to Abate Plan payments and modify the confirmed plan. In support thereof, Debtor avers as follows:

1. Debtor filed for protection under the bankruptcy code on December 3, 2018, bearing case number, 18-17963 AMC.
2. The Chapter 13 Plan was approved by the Court on June 5, 2019.
3. The Debtor has fallen significantly behind in her payments to the Chapter 13 Trustee.
4. Debtor is unable to get caught up on her payments to the Chapter 13 Trustee; consequently, has decided to place her real-property up for sale.
5. Counsel for the Debtor has spoken with the Chapter 13 Trustee's Office and the Trustee has consented to give the Debtor some time to sell her home to pay the first mortgage in full and to make a meaningful distribution to unsecured creditors.
6. Said sale must occur on or before May 15, 2025.
7. Unsecured creditors were receiving little to nothing under the confirmed plan and will now be receiving a meaningful distribution to unsecured creditors from the sale of Debtor's real property. **See Exhibit A.**

WHEREFORE, Debtor respectfully requests the Court to enter an order approving the proposed Modified Plan.

November 14, 2024

/s/ Mitchell Lee Chambers, Esq.
LAW OFFICES OF MITCHELL LEE CHAMBERS
602 LITTLE GLOUCESTER ROAD, SUITE 5
BLACKWOOD, NJ 08012
PHONE: (856) 302-1778